

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Heidi Tolles,)	Civil Action No. 3:18-cv-03227-TLW-PJG
)	
Plaintiff,)	
)	
vs.)	
)	<u>JOINT RULE 26(f) DISCOVERY PLAN</u>
Corporate Solutions, LLC, and University)	
of South Carolina,)	
)	
Defendants.)	
)	

Pursuant to Federal Rule of Civil Procedure Rule 26(f), the parties hereby submit the following proposed discovery plan. This plan is incorporated by reference into the parties' Rule 26(f) Report.

(A) What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement as to when disclosures under Rule 26(a)(1) were made or will be made.

The parties have agreed to waive Rule 26(a)(1) initial disclosures.

(B) The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused upon particular issues.

The parties agree that discovery should be conducted on issues relating to liability, damages, and affirmative defenses in accordance with the Federal Rules of Civil Procedure. The parties discussed Plaintiff's intention to file a Charge with the Equal Employment Opportunity Commission regarding a potential Americans with Disabilities Act ("ADA") violation. The parties agreed to conduct discovery on this potential claim. At this time, the parties further agree that discovery does not need to be conducted in phases or limited to or focused upon particular issues.

(C) Any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced.

The Parties are, at this time, unaware of any issues with respect to electronically stored information. The parties agree to discuss the parameters and costs of electronic discovery if an issue arises.

(D) Any issues about claims of privilege or of protection as trial-preparation materials, including – if the parties agree on a procedure to assert these claims after production – whether to ask the court to include their agreement in an order under Federal Rule of Evidence 502.

No issues regarding claims of privilege or protection of trial preparation materials are anticipated at this time.

(E) What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed.

The parties agree that no changes should be made in the limitations on discovery imposed by the Federal Rules of Civil Procedure or the Local Rules at this time, but that either party may seek to do so if it becomes necessary.

(F) Any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c).

Defendant Corporate Solutions, LLC requests that the Court issue a Confidentiality Order, to be provided separately following review by Plaintiff, to protect employee privacy rights and confidential and proprietary information. The parties do not currently request, but do not waive the right to request, a Pre-Trial Conference pursuant to Rule 16(c) in the future.

[SIGNATURES ON FOLLOWING PAGE]

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